

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

In re: Bair Hugger Forced Air Warming  
Devices Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates to:  
ALL CASES

**DEFENDANTS' MOTION FOR  
RECONSIDERATION OF THE  
COURT'S DECEMBER 13, 2017  
ORDER ON GENERAL  
CAUSATION**

---

Pursuant to Federal Rule of Evidence 702, Defendants 3M Company and Arizant Healthcare Inc. (together, "Defendants") move this Court to reconsider its December 13, 2017 Order, and exclude the opinions of Plaintiffs' medical experts; exclude the opinions and model of Plaintiffs' computational fluid dynamics (CFD) expert, Dr. Elghobashi; and grant summary judgment in favor of Defendants. This motion is based upon the accompanying Memorandum in support of the Motion, the Declaration of Benjamin W. Hulse, as well as the files, records, and proceedings herein.

Dated: January 24, 2019

Respectfully submitted,

*s/Benjamin W. Hulse*

Jerry W. Blackwell (MN #186867)

Benjamin W. Hulse (MN #0390952)

Mary S. Young (MN #0392781)

BLACKWELL BURKE P.A.

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

Phone: (612) 343-3248

Fax: (612) 343-3205

Email: blackwell@blackwellburke.com

bhulse@blackwellburke.com

myoung@blackwellburke.com

Lyn Peeples Pruitt  
MITCHELL WILLIAMS SELIG  
GATES & WOODYARD  
425 West Capitol Avenue, Suite 1800  
Little Rock, AR 72201-3525  
Phone: (501) 688-8869  
Fax: (501) 688-8807  
Email: lpruitt@mwlaw.com

Bridget M. Ahmann (MN #016611x)  
FAEGRE BAKER DANIELS LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Phone: (612) 766-7000  
Fax: (612) 766-1600  
Email: bridget.ahmann@faegrebd.com

**Counsel for Defendants 3M Company  
and Arizant Healthcare Inc.**